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HEARING DATE: April 30, 2019  
TIME: 10:00 A.M.

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

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In Re:

NEW ENGLAND MOTOR FREIGHT, INC.,  
ET AL<sup>1</sup>,

NOTICE OF MOTION  
CHAPTER 11  
Case No. 19-12809-JKS

Debtor,

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PLEASE TAKE NOTICE that upon the annexed declaration of Richard J. Albuquerque, Esquire; declaration of creditor Michael Singley; and the accompanying Memorandum of Law; the undersigned will move this Court before the Honorable John K. Sherwood, United States Bankruptcy Judge, at United State Bankruptcy Court, District of New Jersey, 50 Walnut Street, 3<sup>rd</sup> Floor, Courtroom 3D, Newark, New Jersey 07102 (the "Bankruptcy Court") on April 30, 2019 at 10:00 a.m., or as soon thereafter as counsel may be heard (the "Hearing"), for an Order for Relief from the Automatic Stay to enable Mr. Singley to continue his New Jersey Superior Court personal injury action against debtors, New England Motor Freight, Inc. and Jans Leasing Corp., and for such other and further relief as the Court deems just and equitable.

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<sup>1</sup> The Debtors in these chapter 11 cases and the last four digits of each Debtor's taxpayer identification number as follows: New England Motor Freight, Inc. (7697); Eastern Freight Ways, Inc. (3461); NEMF World Transport, Inc. (2777); Apex Logistics, Inc. (5347); Jans Leasing Corp. (9009); Carrier Industries (9223); Myar, LLC (4357); MyJon, LLC (7305); Hollywood Avenue Solar, LLC (2206); United Express Solar, LLC (1126); and NEMF Logistics, LLC (4666).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion, shall be made in writing, filed with the clerk of the Bankruptcy Court, and served upon counsel for the Movant as to be received at least seven (7) days prior to the Hearing date.

Dated: April 10, 2019

D'ARCY JOHNSON DAY  
Attorneys for Michael Singley

BY: /s/ Richard J. Albuquerque  
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